

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:
Sheila C. Stempel

Debtor.

Chapter 13
Case #: 12-13013

**AFFIRMATION IN RESPONSE TO DEBTOR'S MOTION TO SELL PROPERTY OF
THE ESTATE.**

Creditor, Long Oil Heat, Inc. ("Long Oil"), in response/opposition to the Debtor's Motion to Sell/Transfer Property of the Estate, respectfully shows to the Court and alleges as follows:

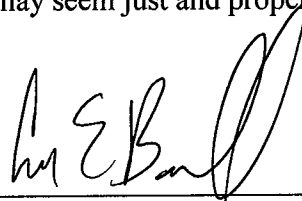
1. That Long Oil, pursuant to a mortgage executed by the Debtor on December 15, 2007, maintains a security interest in property located at 16 Maple Lane, Berne, NY ("Premises"). A copy of said mortgage is attached hereto as Exhibit 1.

2. That Long Oil has recently (February 7, 2013) filed its proof of claim with Clerk of the Bankruptcy Court (claim #9), and has listed the debt which arose by way of a promissory note and mortgage, as secured.

3. That Long Oil joins the Trustee in objecting to any "short sale" of the Premises without its express consent. That given that the proposed transaction at issue is between related parties, it is submitted that \$85,000.00 may not be the fair market value. That the Debtor's attached appraisal report does not indicate the qualifications of the appraiser, nor does it set forth any objective method which was used to value the Premises.

4. Long Oil likewise joins the Trustee in its objection to permitting the attorney fee sought for closing absent further disclosure.

WHEREFORE, Long Oil respectfully requests that the Court condition any Order awarding the Debtor the ability to short sell the Premises upon the express consent of Long Oil, and that the Court make such further rulings as to the Court may seem just and proper.

A handwritten signature in black ink, appearing to read 'Conor E. Brownell', is written over a horizontal line.

Conor E. Brownell